



Executive Director's Recommendation

Commission Meeting: March 1, 2012

PROJECT Turf and Soil Reconstruction – Phases II and III The National Mall Washington, DC	NCPC FILE NUMBER 7110
SUBMITTED BY United States Department of the Interior National Park Service	NCPC MAP FILE NUMBER 1.41(70.00)43522
	APPLICANT'S REQUEST Approval of comments on concept design
	PROPOSED ACTION Approve comments as requested
	REVIEW AUTHORITY Approval per 40 U.S.C. § 8722(b)(1) and (d)

PROJECT SUMMARY

The National Park Service (NPS) has submitted concept designs for Phases II and III of the reconstruction of the turf and soil on the National Mall. Phase I of the project addressed the three easternmost center lawn panels which are between 3rd Street and 7th Street. The scope of Phases II and III includes the remaining lawn panels between 7th Street and 14th Street. The current project includes reengineering of the subsurface soil; planting new turf; constructing shallow, mountable curbs and gutters around the panels to harvest rainwater and contain the engineered soil; grading the panels with a slight crown along the centerline, and constructing a below-grade irrigation and water storage system. Along with the reconstruction of the turf and soil, Phases II and III incorporate recommendations included in the National Mall Plan to increase the size of the non-turf areas on the Mall to improve accommodations for public events.

KEY INFORMATION

- The National Mall is one of the country's most prominent and historic landscapes used for national celebrations, special events, First Amendment activities, and all types of recreation.
- The types and intensity of uses on the National Mall have contributed to its poor condition including worn turf, heavily compacted soil, and poor drainage.
- The National Mall Plan, approved by the Commission in December 2010, recommended that the non-turf areas on the Mall be enlarged in order to better accommodate public events.
- Union Square, an area that is highlighted in the National Mall Plan for its potential to accommodate large public events, thereby reducing wear and tear on the lawn panels, was recently transferred to the Architect of the Capitol.

RECOMMENDATION

The Commission:

Provides the following comments on Phase II and III of the turf and soil reconstruction on the National Mall:

Supports the project and the National Park Service's efforts to improve the condition of the Mall's turf and ability to accommodate high levels of use for First Amendment demonstrations, national celebrations, and other events by widening the walkways in a manner that will preserve and protect the Mall's historic, continuous green landscape.

Supports the idea of establishing a civic, multi-purpose gathering space along the 8th Street axis that provides additional leisure, recreation, and events space on the Mall, and is planned and designed in a manner that takes into consideration visual impacts, historic preservation, and required maintenance.

Notes that each alternative takes into account recommendations from the National Mall Plan to widen the non-turf areas on the Mall in order to better accommodate large public events.

Notes that the proposed alternatives require further refinement, especially with regard to the extent to which the walkways need to be widened and the impacts this may have on the continuous, historic landscape of the Mall, and therefore **recommends** that the National Park Service consult with NCPC staff and representatives from the U.S. Commission of Fine Arts and the District of Columbia State Historic Preservation Officer to refine the walkways prior to submitting for preliminary and/or final review.

Recommends that the National Park Service coordinate any changes to the walkways with the District of Columbia Department of Transportation and the Washington Metropolitan Area Transit Authority to determine if this project impacts areas or ongoing projects that are under their jurisdiction.

Requests the following information at the next stage of review:

- Factors that influence the proposed dimensions of the walkways,
- Calculations of the existing and proposed percentage of turf and walkways for those areas that are directly impacted by the project,
- Maintenance requirements of sacrificial turf panels, and if available, information on permanent paving materials that may be considered to replace the gravel walkways in the future.

PROJECT REVIEW TIMELINE

Previous actions	June 2010 – Concept review of the Turf and Soil Reconstruction – Phase I.
	February 2011 – Preliminary and final approval of Turf and Soil Reconstruction - Phase 1

Remaining actions	<ul style="list-style-type: none">– Preliminary review– Final review

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I. PROJECT DESCRIPTION

Site

The National Mall in Washington, DC, stretches west from the U.S. Capitol to the Potomac River, and north from the Thomas Jefferson Memorial to Constitution Avenue. The smaller area within the National Mall, located between Madison Drive and Jefferson Drive from 1st Street to 14th Street, is known as the Mall. The Mall is a historic landscape composed of turf panels aligned at the center of the east-west axis, which is flanked by rows of trees to the north and south and along Madison Drive and Jefferson Drive. The project site is the portion of the Mall located west of 7th Street.

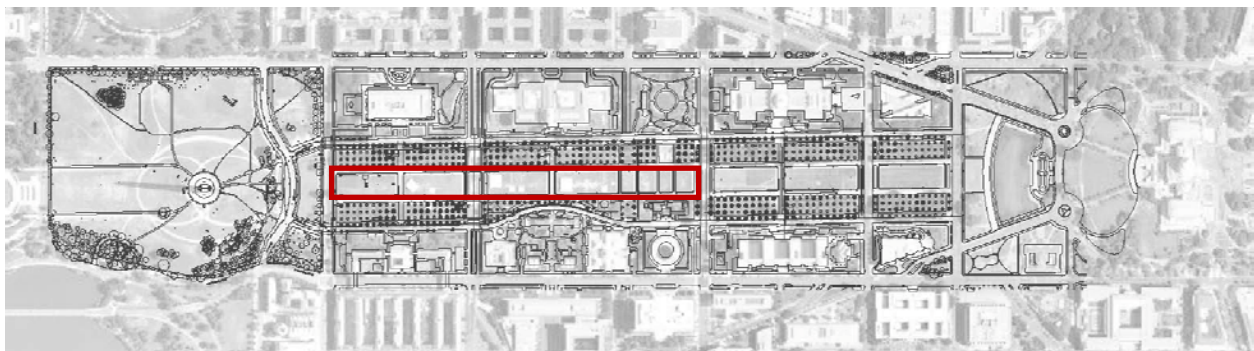


Figure 1: Location of Phases II and III on the National Mall

Background

The National Mall Plan was approved by the Commission in December 2010 and establishes 30 objectives related to cultural and natural resource protection; access and circulation; visitor information, education, and enjoyment; visitor amenities; health, public safety, and security; and park operations. The National Mall Plan proposes to respectfully rehabilitate and refurbish the National Mall so that very high levels of use can be perpetuated. Among the areas to rehabilitate are the turf panels so that demonstrations, special events, cultural activities, other civic events, and passive recreation can continue to take place along the Mall.

One of the highest priorities in the National Mall Plan is the improvement of the health, appearance, durability, sustainability, and recoverability of the Mall turf. The soil is heavily compacted and does not drain well, the turf is often worn away and presents an irregular and uneven appearance, and the irrigation system does not function. The impact of heavy and sustained use creates a strain on the soil and turf, and also on the elm trees. The elm trees are located to the north and south of the center lawn panels along the Mall.



Figure 2: Existing conditions of turf on the National Mall

There has been no major reconstruction on the Mall since the Bicentennial. Since that time, demands on the Mall have increased with more frequent and longer events and higher visitation. The Mall hosts nearly 25 million visitors and around 3,000 special (permitted) events per year. Events include First Amendment gatherings and national celebrations, as well as significant public events like the Smithsonian's Folk Life Festival and the Library of Congress' National Book Fair. Hosting these events is an essential purpose of the National Mall.

Phase I of the turf and soil reconstruction project preceded the Commission's formal adoption of the National Mall Plan. The Commission approved Phase I of the project in February 2011 which addressed the three easternmost center lawn panels between 3rd Street and 7th Street and is currently under construction. While Phase I is generally consistent with the preferred alternative of the National Mall Plan, it does not include modifications to the non-turf areas as recommended in the plan. Phases II and III incorporate recommendations from the National Mall Plan with respect to widening the walkways in order to improve accommodations for public events.

Proposal

The goals for the proposed turf and soil reconstruction project, as defined by NPS, are:

- Develop and establish a healthy and sustainable natural resources baseline for soils, turf and trees so that the Mall can host anticipated types and levels of use.
- Accommodate the high levels of use in a manner that sustains the character and integrity of the Mall.
- Maximize the site's potential for stormwater absorption and minimize reliance on public water use.
- Preserve existing trees and other vegetation to reinforce the historic landscape and emphasize native species.
- Improve the visual quality of the Mall.

Treatment of the lawn panels for Phases II and III are identical to Phase I. Most of the improvements to the lawn panels are below grade and not visible. The visible features proposed would be a shallow, mountable curb and gutter, 18 inches in width and ¼ inch in height, around the perimeter of the lawn panels. The purpose of the curb is to provide structural support and containment for the engineered soil and to direct stormwater to the below-grade water management system. NPS proposes White Mount Airy granite with a flame finish for the curb and gutter.

The curb and gutter would be barely perceptible in height, and fully accessible to those using wheelchairs and strollers. The curb, comprising 12 inches in width of the total 18-inch width, will have an 8% slope with a ¼-

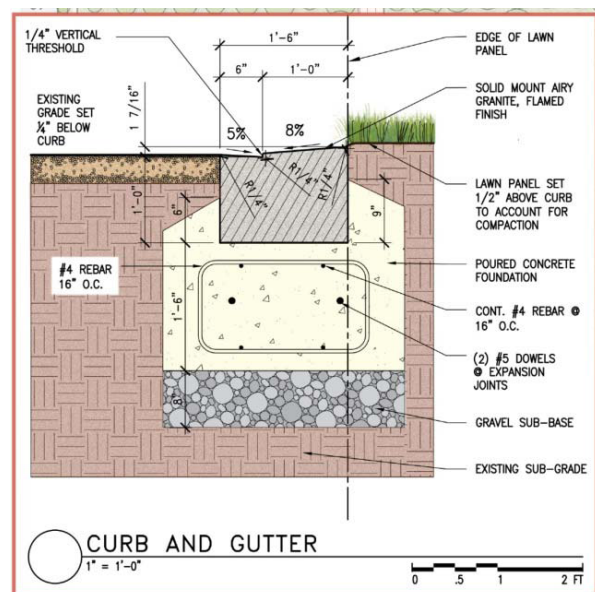


Figure 3: Curb and Gutter detail

inch vertical threshold. The gutter, comprising the outermost 6 inches of the 18-inch width, will have integrated grating-covered catch basins every 36 feet (and possibly farther apart) that will direct runoff into a stormwater drainage line under the lawn panels. The drainage lines will convey the collected runoff to below-grade storage cisterns.

Fifteen-foot curb radii are proposed for the corners of the lawn panels, which would return the curb radii to the dimension that existed in the 1930s -- when Frederick Law Olmsted, Jr. implemented the McMillan Plan -- until the 1970s, when Skidmore, Owens, and Merrill redesigned the roads and paths on the National Mall by, in part, filling the east-west street beds with gravel.

NPS proposes the 15-foot curb radii in part to restore the earlier appearance of the lawn panels, but also as a method of minimizing the compaction of the soil in the lawn panels and deterioration and loss of turf at the corners, a typical and unsightly condition with the current gravel paths, that results from heavy pedestrian traffic. In addition, gravel migrates to the lawn panels and soil migrates to the paths.

Rapid drainage of water is critical if the Mall is to continue to be scheduled for use for events, regardless of rain. Under the current conditions, water ponds at the edges of the gravel paths because it does not drain adequately. To facilitate better drainage, the center panels will be re-graded with a slight crown along the centerline to facilitate flow of water runoff in the gutters and drains. In addition, the gravel pedestrian paths will be re-graded slightly to drain toward the lawn panels and the gutters.

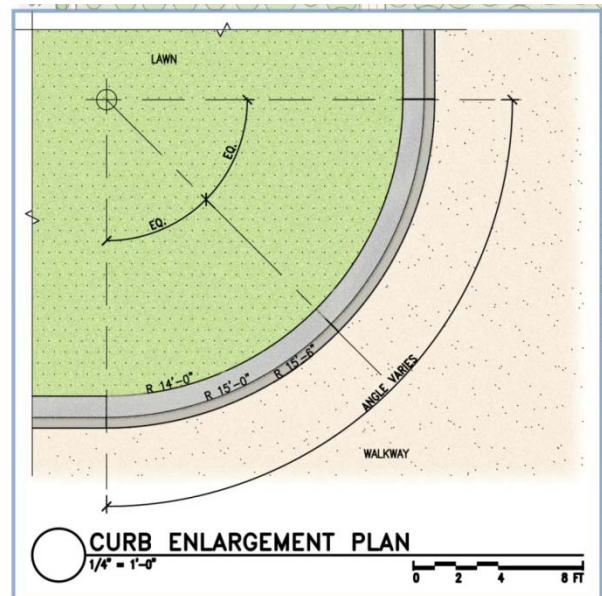


Figure 4: Proposed 15 foot curb radii for lawn panels



Figure 5: Existing conditions of turf on left and proposed curb on right

Rainwater will be harvested through the new system of gutters. A reliable and durable drip irrigation system will be installed beneath the turf, deep enough to avoid puncture by tent stakes. Four, 250,000-gallon cisterns to be installed below the north – south and east - west walkways will connect to a network of lateral pipes and a below-grade pump station. The pump station, which was approved as part of Phase I, is currently under construction below the treeless, open panel on the 8th Street cross-axis south of Madison Drive.

Accompanying the proposed water management system entails the full reengineering of the soil under the turf. The top six inches of existing soil will be removed and stockpiled at the site, with an additional 12 inches of soil removed from the site. The subgrade will be graded to contours parallel to the proposed finish grades and with a 2% cross slope on the lawn panels, an aggregate drainage layer will be laid, and coarse concrete sand will be added to the topsoil. The soil mix will then be added and compacted to the optimum density. The addition of Netlon (a soil mesh reinforcement product) or a similar product will be laid to a depth of six to eight inches below the finished grade to improve compaction resistance. The mesh is a benign, extruded plastic that is resilient to compaction. Finally, the turf (at present, proposed to be a blend of tall, turf-type fescue and fine fescue, mixed with 10% bluegrass) will be grown. The turf blend must accommodate short-term repairs and replacement after events, but also long-term health and viability.

Walkways

Phases II and III of the turf and soil reconstruction include modifications to the walkways along the Mall based on recommendations made in the National Mall Plan. NPS has developed three alternatives for widening the walkways. Each alternative is based on historical plans for the Mall including plans that were executed and plans that were not implemented. In developing the three alternatives, NPS also analyzed the requirements of the typical events held on the Mall annually, including two of the largest events on the Mall, the Library of Congress Book Festival and the Smithsonian Folklife Festival, to evaluate the size and layout of the structures and associated equipment typically required for these events. A variety of equipment and tent sizes are installed on the Mall during special events and therefore the space needs to be flexible to accommodate a wide range of activities. Temporary tents, structures, and equipment can lead to destruction of the turf in less than two weeks when the turf is covered.

NPS analysis showed that the existing configuration of the walkways between 7th and 14th Streets could not meet the needs of these events without strategically widening them. NPS considered whether the walkways would need to be widened if the event structures were placed in Jefferson and Madison Drives as placement of structures on paving is considered a sustainable practice that will protect the turf. The analysis concluded that even if many of the event structures were shifted onto the adjacent streets, there would still be a need to place structures on the lawn panels and therefore the walkways need to be widened in order to preserve the lawn panels.

According to NPS, the current condition of the Mall is approximately 52.6 acres including the elm tree panels, walkways, and turf panels from 3rd Street to 14th Street. Currently, approximately 37.08 acres of the Mall is turf and 15.52 acres are walkways (Figure 6).



Figure 6: Existing configuration of walkways along the Mall

The three alternatives included in the proposal are listed here and describe further below:

- Alternative 1: Skidmore, Owings, and Merrill Inspired
- Alternative 2: Frederick Law Olmsted Jr. Inspired
- Alternative 3: McMillan Inspired

Alternative 1 (Figure 7)

Alternative 1 draws inspiration from the 1974 Skidmore, Owings, and Merrill master plan for the Mall by allowing for wider north-south walkways and “sacrificial” turf panels along the 12th Street and 9th Street axes. Events of longer duration that tend to kill turf would use these sacrificial panels and event sponsors would be responsible to re-sod these areas after the event. The idea behind this strategy is that heavy equipment and tents would be concentrated in these sacrificial areas, thereby reducing impacts to the larger lawn panels. In addition, this design would allow for the continuous green lawn or tapis vert, a key element in the design of the Mall.

Walkways between Panel 18 and 19 and between Panel 21 and 22 would be widened to 80 feet and each of these lawn panels would be reduced by 20 feet. These walkways are currently 40 feet wide. The two small lawn areas along the 12th Street axis would be removed and replaced with gravel. A new 40 foot wide walkway would be added along the 9th Street axis and Panels 23, 24, and 25 would be combined into one larger turf panel that would be 380 feet long. Adjacent to this large turf panel and on the west side of 7^h Street, a new 80 foot wide walkway would be installed. Under Alternative 1, approximately 37.01 acres of the Mall would remain turf with 1.07 acre dedicated to sacrificial turf, and 15.59 acres would become walkway.

Alternative 2 (Figure 8)

Alternative 2 draws inspiration from the Frederick Law Olmsted Jr. plan of 1936 which divided the Mall into eight approximately equal panels, with wider paved areas in the form of active streets and sidewalks intervening in between. This alternative allows for wider north-south walkway widths where events can be concentrated on non-turf areas rather than depending on the continual replacement of sacrificial turf areas.

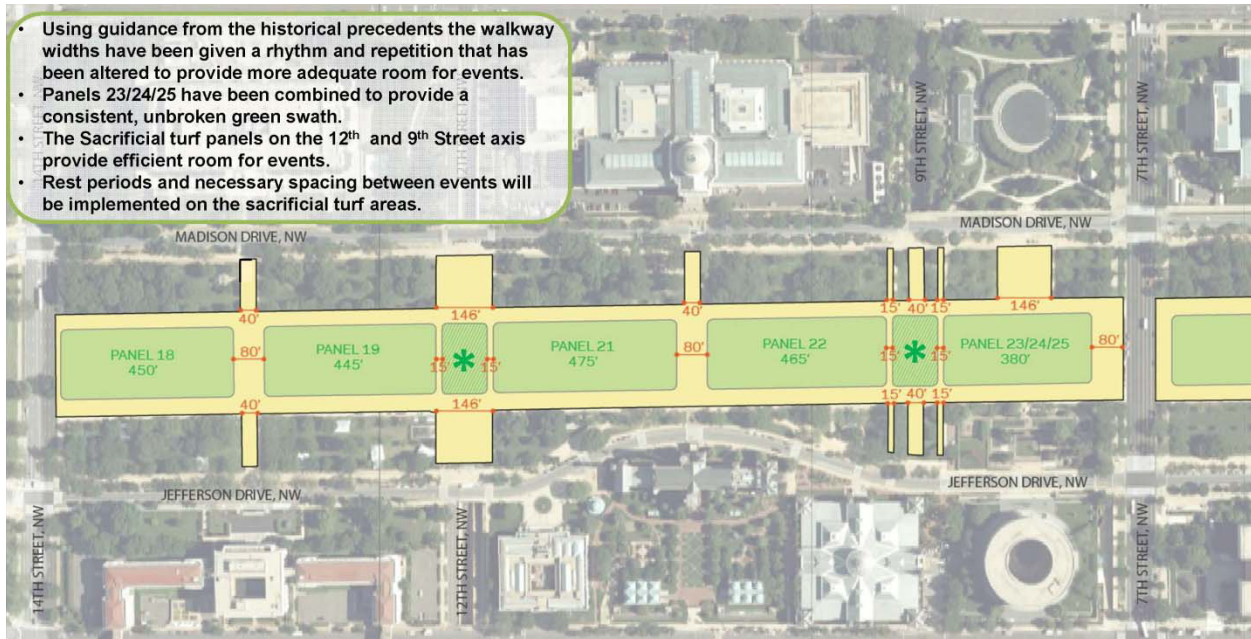


Figure 7: Alternative 1 - SOM Inspired Design

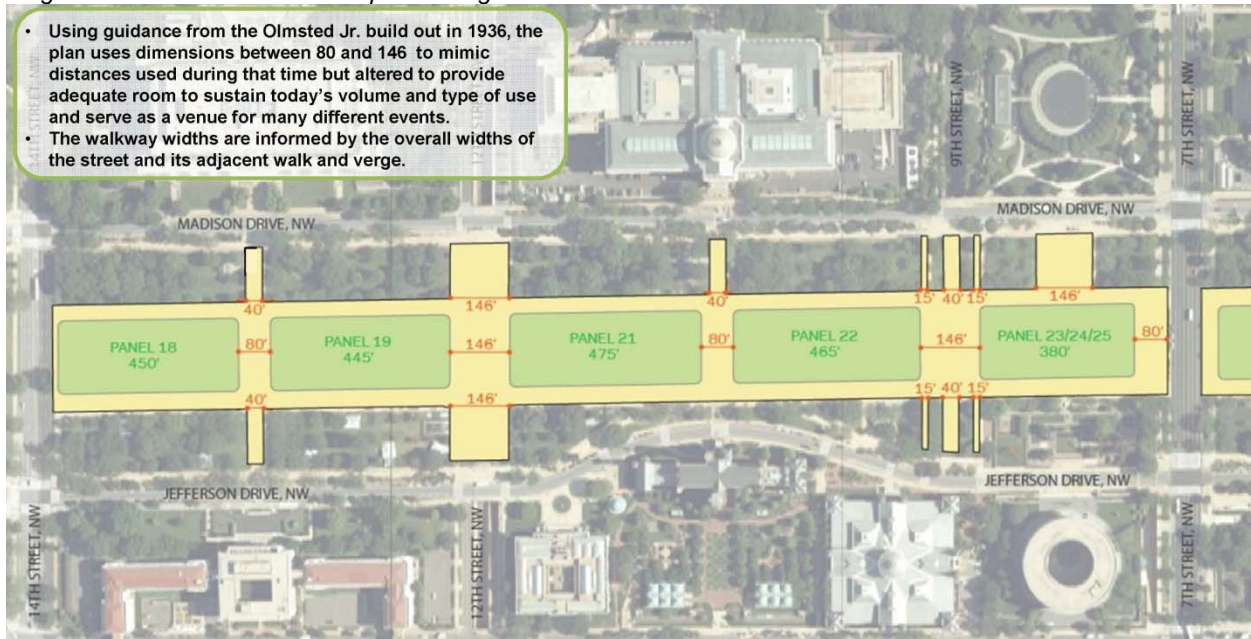


Figure 8: Alternative 2 – Frederick Law Olmsted Jr. Inspired Design

The dimensions of the walkways are similar to those proposed for Alternative 1. Walkways between Panel 18 and 19 and between Panel 21 and 22 would be widened to 80 feet. In addition, the two small lawn areas along the 12th Street axis would be removed and replaced with gravel. A new 40 foot wide walkway would be added along the 9th Street axis. Along the 12th and 9th Street axes rather than sacrificial turf, these areas will be gravel. Panels 23, 24, and 25 would be combined into one larger turf panel that would be 380 feet long. Adjacent to this large turf panel and on the west side of 7th Street, a new 80 foot wide walkway would be installed. Under Alternative 2, approximately 36.14 acres of the Mall would remain turf, and 16.46 acres would become walkway.

Alternative 3 (Figure 9)

Alternative 3 draws inspiration from an unrealized element of the McMillan Plan and proposes to create a central plaza along the 8th Street axis. A central feature of this plaza would be a water feature flanked on either side by four “sacrificial” turf panels for a total of eight smaller turf panels. A 40 foot wide walkway would be located on the west side of 7th Street and an 80 foot wide walkway would be located between Panel 22 and the plaza’s west side. Panel 22 would be enlarged to approximately 530 feet long and similar to Alternatives 1 and 2 a 40 foot walkway would be installed along the 9th Street axis. Also, similar to Alternative 1, a sacrificial turf panel would be located along the 12th Street axis. As proposed in Alternatives 1 and 2 an 80 foot wide walkway would be installed between Panels 18 and 19. Under Alternative 3, approximately 36.44 acres of the Mall would remain turf with 1.49 acre dedicated to sacrificial turf, and 16.16 acres would become walkway.

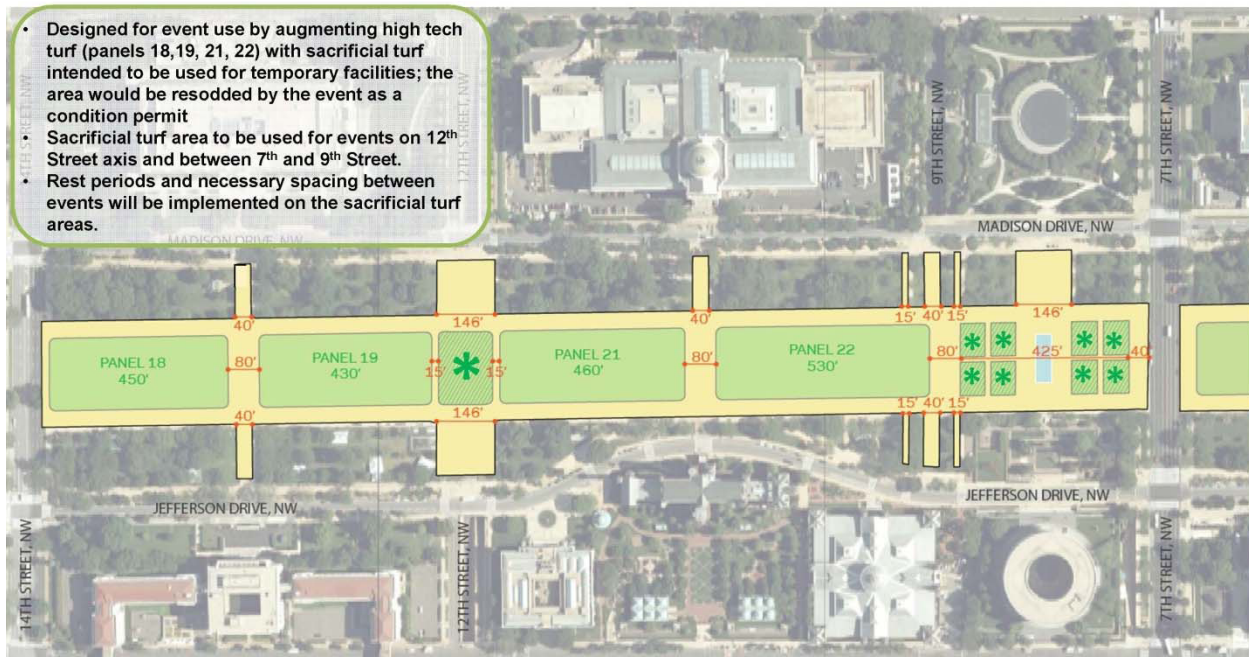


Figure 9: Alternative 3 – McMillan Plan Inspired Design



Looking east towards The Capitol
from The Washington Monument

Figure 10: Alternative 3 – Perspective rendering



Figure 11: Alternative 3 – View from the Capitol steps

II. PROJECT ANALYSIS/CONFORMANCE

Executive Summary

Staff supports NPS and its design team for developing three possible alternatives to improving the turf conditions on the Mall and recognizes the difficult challenge of developing a strategy to accommodate a variety of high-intensity uses and events in one of the nation's most prominent historic landscapes. Each alternative strives to protect cultural resources and reduce impacts to natural resources while accommodating high levels of use for First Amendment demonstrations, national celebrations, events, and entertainment.

Analysis

When the Commission approved Phase I of the turf and soil reconstruction, it commended NPS for providing improved stewardship of the cultural and natural resources on the National Mall, for improving the physical conditions for permitted and informal activities on the National Mall, and for improving the sustainability of resources and management practices. At the time Phase I was approved, the subject of most discussion was the installation of a low curb and gutter around the perimeter of the center lawn panels. An identical curb and gutter system will be used on the lawn panels for Phases II and III. In addition, as NPS proposed for Phase I, Phases II and III will utilize a 15-foot radius at the corners of the lawn panels. The curbs will provide a visual cue to visitors to stay on the gravel paths when reaching a path intersection, rather than cutting across the panel corners. The curb and gutter are shallow and easily mountable by wheelchair and stroller users who wish to use the center lawn panels. More important, the curb and gutter will mark where vehicles used during special events should not drive more emphatically than the current irregular edges can do.

While construction of the curb and gutter represents an alteration to the current 1970s scheme of gravel paths and grass panels, and therefore a diminution of integrity of the SOM design to some degree, staff has determined that the poor and unhealthy appearance of the grass panels, damage to the turf and to the elm trees from soil compaction, and the erosion of the corners diminish the integrity of the SOM design and intention for the National Mall to a greater degree than what is being proposed. Therefore, Staff's analysis for Phases II and III focused on the proposed walkway widening.

Staff recommends that the Commission **support the project and the National Park Service's efforts to improve the condition of the Mall's turf and ability to accommodate high levels of use for First Amendment demonstrations, national celebrations, and other events by widening the walkways in a manner that will preserve and protect the Mall's historic landscape.** Alternatives 1 and 2 both strive to balance preserving historic characteristics of the Mall and allowing for high levels of use for a variety of event sponsors and types. Both alternatives propose widening north-south walkways from 80 to 146 feet in an effort to create a pedestrian friendly environment while also providing adequate space for equipment and tents. These configurations also allow for the existing continuous visual green lawn or tapis vert effect to remain a key visual component of the Mall. Staff notes that additional information is required in order to completely analyze the appropriateness of the proposed dimensions for the walkways. A 146 wide walkway may cause a significant break in the character-defining green lawn of the Mall and could have adverse effects on the historic landscape.

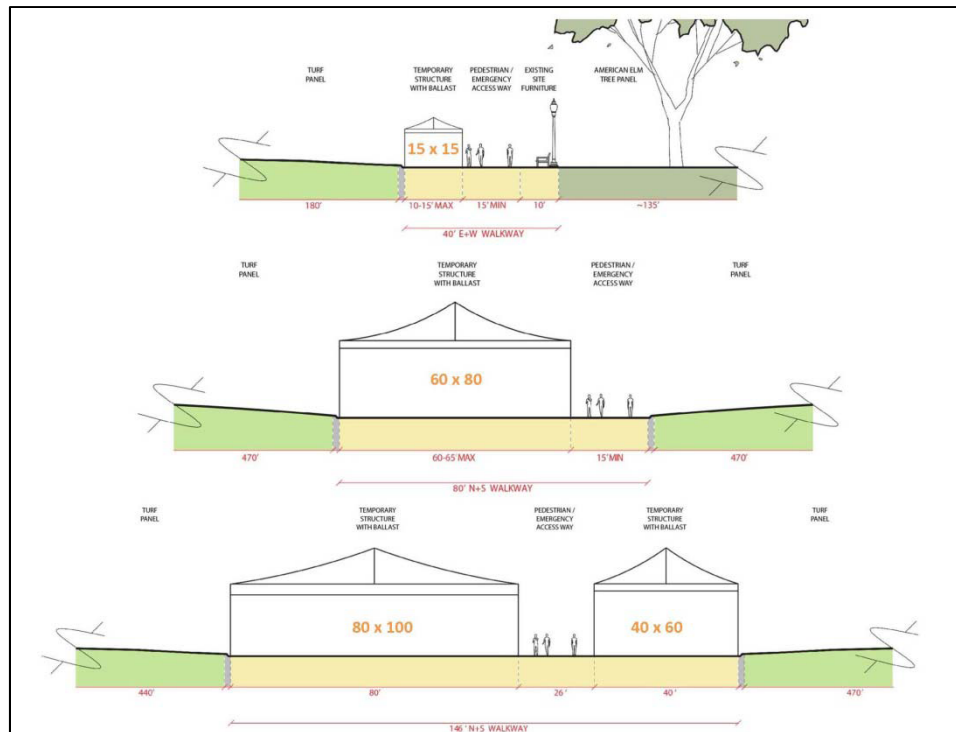


Figure 12: Proposed tent layout on walkways

Consultation with the U.S. Commission of Fine Arts, the District of Columbia Historic Preservation Officer, and other consulting parties through the Section 106 consultation process is necessary to determine the appropriate dimensions for the walkways and to avoid, minimize, and mitigate any potential adverse effects on historic resources. As NPS refines the design for Phases II and III, the walkway widths or non-turf areas should be minimized to the maximum extent possible in order to preserve and protect the lawn panels. Through the use of smaller turf panels along the 12th and 9th Street axes, Alternative 1 minimizes the visual impact of the walkways. However, the use of sacrificial turf panels in Alternative 1 may require more maintenance and water usage than Alternative 2, thereby reducing its effectiveness in achieving sustainability goals. The advantages of the design of Alternative 1 are that it would result in a slightly larger pervious surface area than Alternative 2. In addition, by using turf rather than gravel, these two areas would be available for recreational and sporting or informal play activities.

Advantages of Alternative 2 over Alternative 1 include the space on walkways that would be available for tents and equipment during special events. The advantages to this design are that tents and equipment would be placed on gravel and therefore reduce the potential for impacts to the lawn panels. The National Mall plan recommended that the walkways along the Mall be “paved with low-maintenance, sustainable, and universally accessible materials that would be part of a palette of paving materials.” The current project does not include paving the walkways, but NPS anticipates that that the walkways will be paved in the future. The paving material selected for the walkways is an important consideration at this time when modifications to the size and configuration of the walkways is proposed. In selecting the material, there will be aesthetic, historic preservation, sustainability, and maintenance issues to address and therefore

though NPS is not proposing to install paving at this time, it is an important factor that should be considered in NCPC's review of the turf reconstruction project.

While Alternative 3 takes its cues from the McMillan Plan, the McMillan vision of a plaza and water feature along the 8th Street axis was never implemented. Therefore, if implemented, Alternative 3 would constitute a much more substantial alteration to the Mall and likely have more impacts on historic resources than Alternatives 1 and 2. The introduction of a water feature and the smaller sacrificial turf panels would create the greatest number of alterations to the Mall and would break up the visual consistency of the Mall's lawn panels. However, the plaza would break up the tapis vert; create visual interest and a useful, central gathering space for the variety of events on the Mall; and achieve a worthwhile McMillan Plan goal of providing relief from "the monotony of the meadow-like stretch a mile and a half long" and to provide "seats tempting the passer-by to linger for rest." Though a fixed, raised, formal water feature may not necessarily be the most appropriate solution at this point in time, another type of intervention along the 8th Street axis, perhaps one that could serve multiple purposes and incorporate an unobtrusive water feature, could improve the visitor experience along the Mall and ultimately achieve what the McMillan Plan sought to do in this location. Therefore, staff recommends that the Commission **support the idea of establishing a civic, multi-purpose gathering space along the 8th Street axis that provides additional leisure, recreation, and events space on the Mall, and is planned and designed in a manner that takes into consideration visual impacts, historic preservation, and required maintenance.**

Overall, following an analysis of the proposed alternatives as described above, staff recommends that the Commission **note that the proposed alternatives require further refinement, especially with regard to the extent to which the walkways need to be widened and the impacts this may have on the continuous, historic landscape of the Mall, and therefore recommends that the National Park Service consult with NCPC staff and representatives from the U.S. Commission of Fine Arts and the District of Columbia State Historic Preservation Officer to refine the walkways prior to submitting for preliminary and/or final review.**

Furthermore, sidewalk closings that may result from construction of the project could impact adjacent streets and therefore should be coordinated with DDOT. In addition, staff is aware that WMATA is planning improvements to the vent shafts along 7th Street and the Mall to reduce flooding impacts on the Metro rail system. Any effort to widen the walkways on the Mall should be coordinated with WMATA in order to design a compatible solution for both the walkways and vent shafts. In light of these two issues, staff is recommending **that the National Park Service coordinate any changes to the walkways with the District of Columbia Department of Transportation and the Washington Metropolitan Area Transit Authority to determine if this project impacts areas or ongoing projects that are under their jurisdiction.**

Finally, staff is recommending that the Commission **request additional information at the next review stage to assist in fully analyzing the impacts of widening the walkways.** Information on the factors and criteria that influence the proposed dimensions of the walkways is needed in order to determine what is an appropriate width and size of the walkways. In addition, the provided calculations regarding the percentage of acreage that will remain turf and walkways currently include parts of the Mall that will not be impacted by the proposed project. The elm tree panels to the north and south of the central lawn panels will not be modified and this acreage should not be included in the calculations. The acreage should be calculated based

on the center lawn panels and actual walkways that will be widened in order to determine the most appropriate walkway widths that still preserve the consistent greensward appearance of the Mall, an important character defining element. Additional information on how often NPS anticipates the sacrificial turf panels would need to be replaced should also be provided along with the difference in water usage the sacrificial areas may demand compared to if these areas were gravel. While the proposed project does not include paving the walkways, the paving material will have implications for the design and function of the Mall and it would be beneficial to consider these issues concurrently with the changes proposed to the walkways.

Comprehensive Plan for the National Capital

Phases II and III of the turf and soil reconstruction would not be inconsistent with the Federal Elements of the Comprehensive Plan for the National Capital. The project is consistent with the following policies in the Environment, the Parks and Open Space, the Preservation and Historic Features, and Visitors Elements:

- Enhance parks and preserve open green space for future generations.
- Establish and preserve historic parks as important legacies of national, historic, architectural, and landscape significance.
- Encourage the use of innovative and environmentally friendly "Best Management Practices" in site and building design and construction practice, such as green roofs, to reduce erosion and avoid pollution of surface waters.
- Encourage the implementation of water reclamation programs at federal facilities for landscape irrigation purposes and other appropriate uses.
- Protect and enhance the vistas and views, both natural and designed that are an integral part of the national capital's image.
- Identify and protect both the significant historic design integrity and the use of historic landscapes and open space.
- Continue to sponsor displays, special events, and arts, cultural, and recreational activities in, on, and around federal facilities in the monumental core, in other areas of the District, and throughout the region.

National Mall Plan

The National Mall Plan seeks to rehabilitate and refurbish the National Mall so that very high levels of use can be perpetuated and the needs of all visitors and users can be met in an attractive, high-quality, energy-efficient, and sustainable manner. The plan establishes a framework to protect memorials and landscapes while maintaining large areas of unprogrammed open space. The plan seeks to balance contemporary uses while respecting the planned historic landscapes of the L'Enfant and McMillan plans.

The National Mall Plan establishes the following objective for the Mall (between 3rd and 14th Streets):

- Remain a highly visible landscape that would be renovated to improve conditions and to sustainably accommodate very high levels of use for First Amendment demonstrations, public gatherings, national celebrations, cultural programs, and special events, as well as passive recreation and informal play.

In order to achieve this objective the National Mall Plan calls for the following:

- Protection and improvement of lawn panels.
- Replacement of compacted soils in turf areas with engineered soils that can withstand intense use, or implement other sustainable technologies.
- Provide drainage and irrigation; design an irrigation system so that it will not be damaged by event facilities
- Widen some walks to enhance the visitor experience by providing room for orientation and space for rest and enjoyment, to facilitate First Amendment demonstrations and permitted events, and to allow for more efficient park operations.
- Redesign the 12th Street axis to accommodate high levels of use, and the placement of tents, stages, and logistical and operational areas for permitted events.
- Reconfigure the center grass panels near the 8th Street cross axis to provide larger spaces for informal recreation.

Phase II and III of the turf and soil reconstruction project are consistent with the Mall Plan objectives listed above.

National Environmental Policy Act (NEPA)

To comply with the National Environmental Policy Act (NEPA), the NPS conducted an Environmental Assessment (EA) prior to the implementation of Phase 1. The EA evaluated the environmental impacts of an action alternative and a no action alternative. Within the action alternative, three curb and gutter options were evaluated that analyzed the edge conditions for the lawn panels and the transition between the walkways and the turf. Three options were also analyzed for the reconstruction of the soil that explored different materials and design. The EA also evaluated different systems of water distribution, irrigation, and water storage.

The NPS held a public scoping meeting on March 9, 2010. The EA was made public on November 2, 2010 for a thirty-day public comment period.

The NPS concluded the EA with a Finding of No Significant Impact (FONSI), signed on January 21, 2011. NCPC issued a FONSI based on this EA in conjunction with its approval for Phase I of the project. NCPC will need to issue a separate FONSI for Phases II and III prior to approval of a preliminary design.

National Historic Preservation Act (NHPA)

The NPS consulted with the District of Columbia State Historic Preservation Officer (DC SHPO) under Section 106 of the National Historic Preservation Act for Phase I of the turf and soil reconstruction project. The NPS determined Phase I would have no adverse effect on historic properties and the DC SHPO concurred with that finding.

The NPS and NCPC have Section 106 responsibilities for Phases II and III and should coordinate these reviews to avoid, minimize, and mitigate potential adverse effects on historic properties. NPS and NCPC have had informal consultation with the DC SHPO on Phases II and III and will initiate Section 106 consultation in the near future. Initial feedback received by staff from the DC SHPO indicates that modifications to the size of the walkways and non-turf areas

should seek to balance the preservation of the continuous green lawn or tapis vert of the Mall with the need for space to accommodate special events. Additional information on the criteria influencing the design and dimensions of the walkways will be needed to assess impacts on historic properties.

III. CONSULTATION

Coordinating Committee

The Coordinating Committee reviewed the proposal at its February 8, 2012 meeting, and forwarded the proposal to the Commission with the statement that the proposal has been coordinated with all participating agencies. The participating agencies were NCPC; the District of Columbia Office of Planning; the District Department of Transportation; the National Park Service; the General Services Administration; and the Washington Metropolitan Area Transit Authority.

U.S. Commission of Fine Arts (CFA)

At its meeting on February 16, 2012, CFA reviewed a concept for the three proposed alternatives. While CFA supported the general approach of the project, and in particular the environmental improvements and the lawn panel construction details of the curb and gutter system, it raised concerns about the configuration of the panels and the increased widths of the walkways. Specifically, the CFA Commissioners emphasized the importance of protecting the integrity of the Mall as a continuous green, designed landscape, noting that any alterations made should follow a principle of maximizing green space and minimizing increases in paved areas that could disrupt the fundamental character of the landscape. In order to minimize impacts, CFA made several recommendations in response to the proposed alternatives which are described in its letter dated February 24, 2012 (see attachment).